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tiff was struck in the eye by a small piece of a bullet thrown off by the impact upon the target. Following the decision of the Virginia court, which it cites amongst other cases, the Massachusetts court held that the plea of independent contractor would not relieve the defendant of liability. *Curtis* v. *Kiley*, 153 Mass. 123; *Railway Co.* v. *Moore* (Va.), 27 S. E. 70; *Railroad Co.* v. *Morey* (Ohio), 24 N. E. 269; *Hawver* v. *Whalen* (Ohio), 29 N. E. 1049; *Bower* v. *Peate*, 1 Q. B. Div. 321.

LEGAL TENDER.—In *North Hudson etc. R. Co.* v. *Anderson*, (N. J.), 39 Atl. 905, it is held that a dollar bill from one corner of which has been torn a piece, one inch and a quarter by an inch and a half, is not a legal tender, notwithstanding that it is redeemable under the rules of the United States Treasury Department. The court lays down the rule that no person can be compelled to accept a part of a bill as legal tender. And that if any portion of the bill which might aid in determining whether it is a genuine bill or not, be missing, it is not a legal tender.

WIFE'S RIGHT OF ACTION FOR ALIENATION OF HUSBAND'S AFFECTIONS.—The Pennsylvania Court is the latest acquisition to the long list of those courts which, under the influence of the married woman's emancipation acts, allow the wife the same standing in court, in asserting a claim for damages for the alienation of her husband's affections, as the husband has at common law for the alienation of his wife's affections. *Gernerd* v. *Gernerd* (Pa.), 39 Atl. 884.

In running over the list of cases of this character, one is struck with the fact that the names of the parties indicate that it is some member of the delinquent husband's family who is usually the moving cause of the trouble between husband and wife. For example, in addition to the case just cited, *Bennett* v. *Bennett*, 116 N. Y. 584; *Westlake* v. *Westlake*, 34 Ohio St. 621; *Warren* v. *Warren*, 89 Mich. 123; *Bassett* v. *Bassett*, 20 Ill. App. 543; *Price* v. *Price*, 91 Iowa, 693; *Mehrhoff* v. *Mehrhoff*, 26 Fed. 13; *Huling* v. *Huling*, 32 Ill. App. 519; *Hodgkinson* v. *Hodgkinson*, 43 Neb. 269 (47 Am. St. Rep. 759); *Brown* v. *Brown* (N. C.), 27 S. E. 998; *Waldron* v. *Waldron*, 45 Fed. 315; *Postlewaite* v. *Postlewaite* (Ind.), 28 N. E. 99; *Holmes* v. *Holmes*, 133 Ind. 386; *Williams* v. *Williams*, 20 Col. 51; and the opposing cases of *Duffies* v. *Duffies*, 76 Wis. 374, and *Smith* v. *Smith* (Tenn.), 38 S. W. 439.

The moral of this is that the young married pair should be let alone—especially by the over zealous parents of the groom.

TAXATION—LIFE INSURANCE POLICIES.—In *State Board of Tax Com'rs* v. *Holliday*, 49 N. E. 14, the Supreme Court of Indiana was confronted with the important question whether unmatured life insurance policies are subject to taxation. The Constitution of the State requires that all property, not exempt, shall be taxed. The schedule prescribed by the taxing Act, after enumerating various subjects of taxation, contains the general specification of "all other goods, chattels and personal property, including credits."

The court held that the constitutional provision was not self-executing, but required appropriate legislation to make it effectual; and while the taxing Act was broad enough to include life insurance policies, yet such is the nature of the